5.0 COMPLIANCE MONITORING

The Compliance Monitoring Plan is incorporated with the SAP in Appendix C. The Compliance Monitoring Plan includes the methods and procedures for:

- Performance Monitoring-Confirm during active remediation that the excavation meets the requirements of the cleanup action by removal of all soil with concentrations of one or more of the target pesticides above the selected cleanup level.

- Confirmational Monitoring-Confirm that the Cleanup Action meet the requirements of the Agreed Order by meeting the cleanup levels for soil ~~and perched groundwater in the vadose zone~~ at the defined points of compliance.

Protection monitoring is addressed in the HASP in Appendix D.

5.1 COMPLIANCE MONITORING

Sampling and analysis plan (WAC 173-340-820) and the Compliance Monitoring Plan (WAC 173-340-410) have been combined in the SAP for the cleanup action and included in Appendix C. The SAP provides a detailed description of the specific procedures to ensure the collection, handling, and analysis of sufficient soil and perched groundwater in the vadose zone samples to confirm that the final cleanup action meets the requirements of the Agreed Order. Two additional rounds of annual compliance soil sampling will be performed on the Preschool Property at compliance soil sampling locations PS-1 and PS-2 to complete the compliance monitoring requirements for the Agreed Order. The first round of sampling will be performed during March 2004 and the second round approximately a year later ~~during the first quarter of 2004~~. Results of the additional soil sampling will be provided verbally to Ecology following each round and in a summary letter report following completion of both rounds. Final laboratory analytical reports for the additional soil sampling will be provided to Ecology following each round. Should test results from the two additional soil sampling rounds exceed the cleanup levels established for target pesticides in soil at the Site, Ecology and the PLPs will confer and determine what, if any, additional work needs to be done.

6.0 SCHEDULE

The proposed schedule for the site cleanup is based on a normal five-day workweek. All work will be performed during daylight hours with a standard 8-hour workday. A contingency of one week has been included in the estimated schedule to compensate for periods when wet weather conditions preclude excavation or exposure of the contaminated subsurface soils at the site.

Based on the preliminary schedule agreed upon with Ecology, the site cleanup is scheduled to begin in early July 2000. All work will be done when the preschool is not in operation. Table 7 provides the proposed project schedule.

6.1 PRE-EXCAVATION ACTIVITIES

Pre-excavation activities will be initiated approximately two weeks in advance of the soil excavation. Approximately 12 days will be required to collect and analyze soil samples from the Category 3 Soils areas. During the period of time necessary to complete the laboratory analysis, the perimeter silt fence will be installed, all the above-ground vegetation and concrete paving will be cleared and removed from the site, the garage will be demolished and the construction debris will be transported off-site and disposed of as non-hazardous solid waste, and the debris piles on-site will be removed. A utilities location will be performed for both the private property and the public utilities that may potentially be affected by the cleanup activities, and existing utility services will be shut-off.

6.2 SOIL EXCAVATION AND DISPOSAL

Soil excavation and disposal activities will require approximately 3 to 4 weeks to complete and will be contingent on attaining confirmational soil samples from the proposed areas of excavation that are below the approved cleanup levels for the site. Adverse weather conditions may have a significant effect on this schedule.

6.3 SITE RESTORATION

Once results of the final confirmation soil samples are received, site restoration activities will be initiated. The backfill and grading of the site will take approximately one week to complete, followed by one day for hydroseeding the site. Reconstruction of the garage will be completed in approximately two weeks.

7.0 DOCUMENTATION REQUIREMENTS

Documentation will be necessary to meet the requirements of the Agreed Order with Ecology. All documentation generated for this cleanup will be submitted directly to Ecology, the PLPs, and their representatives with the weekly reports. Copies will be retained in Farallon files for a minimum of 10 years after completion of the project.

7.1 WEEKLY REPORTING

Daily field reports and field notebooks will be completed by Farallon field personnel for the site cleanup. Copies of all field reports will be kept on-site during the cleanup, with originals retained in Farallon files. Copies of the daily reports will be provided with the weekly summary report.

Weekly reports will be provided during the active remediation of the site and will be discontinued once the site restoration is completed. Weekly reports will be provided to Ecology in the form of a technical memorandum and will include: an update on the cleanup progress and any deviations from the CAP because of changing site conditions, available analytical data from performance and compliance sampling, and available waste manifests as per the EMMP.

7.2 QUARTERLY REPORTING

Quarterly reports will be prepared for the on-going interim actions and once the cleanup has been initiated. Quarterly reports will summarize activities performed during the quarter and planned activities for the following quarter. The quarterly reports will be submitted to Ecology within two weeks after the end of the quarter.

7.3 MANIFESTING AND WASTE DISPOSAL TRACKING

Specific documentation requirements will be met for transportation and disposal of the soil and wastewater generated from the site cleanup. The waste disposal tracking documentation requirements are defined in the EMMP (Appendix A) and are summarized below.

7.3.1 Category 1 and 2 Soils

The Uniform Hazardous Waste Manifest will be used for the transport and disposal of the Category 1 and 2 Soils, with the description of the waste as being "contaminated soils, not regulated by Washington Dangerous Waste Regulations." Copies of signed Manifests will be provided to Ecology within 15 calendar days of disposal with the weekly reports.

7.3.2 Category 4 Soils

Category 4 Soils will be manifested with the RCRA Identification Number WAH 000 005 421, that was issued by Ecology for the site on June 16, 1998. The RCRA Identification Number will be used on all annual reports, manifests, and documents that are required by the incineration facility. Copies of the signed manifests will be provided to Ecology within 15 days of disposal with the weekly reports.

7.4 FINAL CLOSURE REPORT

A final closure report will be prepared once there is sufficient data for soil and perched groundwater in the vadose zone to confirm that the cleanup levels at the defined points of compliance have been met and the requirements of the Agreed Order have been completed. The final closure report will be submitted as Final Draft report for Ecology review and comment.

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